



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 8**

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**APR 16 2015**

Ref: R8 EPR-N

Dave Rosenkrance  
Dakotas Area Office  
Bureau of Reclamation  
304 East Broadway Avenue  
Bismarck, ND 58501

Re: NAWS Final Supplemental EIS, CEQ #20150099

Dear Mr. Rosenkrance:

Thank you for the opportunity to review the Bureau of Reclamation's (Reclamation's) Final Supplemental Environmental Impact Statement (EIS) for the Northwest Area Water Supply (NAWS) project. The U.S. Environmental Protection Agency Region 8 is providing these comments consistent with our authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The NAWS project is intended to serve as a reliable, high quality drinking water supply to a ten-county area in northwestern North Dakota through 2060. In the Final Supplemental EIS, Reclamation selected a new Biota Water Treatment Plant (WTP) option at Max, ND. Reclamation has moved from "Chlorination/UV Inactivation" to "Conventional Treatment." The EPA commends Reclamation's commitment to providing a reliable drinking water supply that meets or exceeds all health based standards as authorized in the Safe Drinking Water Act (SDWA) and as prescribed in the National Primary Drinking Water Regulations (NPDWR) through selection of the Conventional Treatment option for the Biota WTP. The selection of the Conventional Treatment option reduces disinfection byproducts (DBPs), in contrast to the Chlorination/UV option, previously identified in the Supplemental Draft EIS. DBPs are carcinogens regulated under the NPDWRs.

The Chlorination/UV Inactivation option would not have had the capability to remove DBP precursors prior to chlorination, enabling DBP formation upon chlorination. The backup plan for this option, a switch from chlorine to chloramines, would also have been problematic because emerging information shows that chloramines can also produce DBPs and other water quality issues with human health risks. Although the Chlorination/UV Inactivation option appeared sufficient to address biota transfer concerns, SDWA compliance and protection of human health drove selection of the Conventional Treatment Biota WTP option to the benefit of both goals.

The newly selected Conventional Treatment option includes infrastructure and multiple options for minor adjustments to remove DBP precursors prior to chlorination, reducing their formation, while meeting the project's biota transfer prevention goals. Additionally, the Supplemental EIS

identifies foreseeable source water changes due to climate change and human influence. The Conventional Treatment option increases NAWWS's resiliency and flexibility to respond to foreseeable environmental changes likely to occur between the present and 2060. The selection of the Conventional Treatment option also addresses the EPA's Supplemental Draft EIS comments regarding Biota WTP Options, Adaptive Management & Monitoring and DBP Formation Potential.

The EPA appreciates Reclamation's coordination with the EPA to develop a shared understanding of the risks associated with the previously selected Biota WTP option, UV/Chlorination, and the benefits of the newly selected option, Conventional Treatment. We appreciate Reclamation's willingness to involve the EPA in the adaptive management process, but, based upon selection of the Conventional Treatment option for the Biota WTP, we do not currently consider our continued involvement to be necessary. We are, however, available to Reclamation for further assistance regarding treatment for SDWA or biota transfer concerns. If we may provide further assistance, please contact me at 303-312-6704, or Maggie Pierce, Lead NEPA Reviewer, at 303-312-6550.

Sincerely,



Philip S. Strobel, Acting Program Director  
NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

cc: Alicia Waters, Bureau of Reclamation  
Dan Jonasson, City of Minot Public Works  
Michelle Klose and Tim Freije, North Dakota Water Commission  
Greg Wavra, North Dakota Department of Health